

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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NEXT Payment Solutions, Inc.,

Civil No. 17 CV 8829

Plaintiff,

v.

Honorable Steven C. Seeger

CLEAResult Consulting, Inc.,

Defendant.

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**PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiff moves the Court for leave under Local Rule 5.8 to file under seal Exhibit 1 attached to the Declaration of Michelle E. Dawson in Support of Plaintiff’s Response in Opposition to Defendant’s Motion in Limine to Exclude Argument or Evidence in Support of an Unjust Enrichment Claim Premised on Proprietary Information (“NEXT’s Response”). In support of its motion, NEXT states the following:

1. The Court entered an Agreed Confidentiality Order on May 16, 2018 (Dkt. 74) that remains in effect.
2. NEXT has designated certain deposition testimony Confidential under the Order.
3. A portion of NEXT’s Response relies upon deposition testimony that has been designated Confidential.
4. Such testimony is attached as Exhibit 1 to the declaration of Michelle E. Dawson submitted with NEXT’s Response.
5. Pursuant to Local Rule 26.2, NEXT has electronically filed an unredacted version of Exhibit 1 under seal.

Accordingly, NEXT respectfully requests that this Court grant it leave to file under seal Exhibit 1 to the Declaration of Michelle E. Dawson in Support of NEXT's Response.

I declare under penalty of perjury under 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: September 27, 2021      /s/ Michelle E. Dawson  
Michelle E. Dawson